

**REMARKS**

Examiner rejects claims 1-36 under 35 U.S.C. 102(e) as being anticipated by Grun (US 6,629,166). Applicant's claims 1, 12, 21, and 34 disclose limitations similar to receiving a plurality of write transactions **to be write combined** from a processor and flushing data **associated with the plurality of write transactions**. In contrast, Grun does not disclose or suggest write combining, but rather forwarding write requests as discussed below. Furthermore, Grun does not disclose flushing data associated with the plurality of write transactions. In fact, Grun discloses at col. 4 lines 1-11:

Transferring data may include: loading the data in at least one buffer in one of the at least one initiating unit; sending the data from the buffer to one of the at least one I/O controller; and receiving the sent data at the one of the at least one I/O controller. The transferring of data may include: loading the data in at least one buffer in one of the at least one I/O controller; sending the data from the buffer to one of the at least one initiating unit; and receiving the sent data at the one of the at least one initiating unit

Consequently, Grun only contemplates transferring data from an initial transferor's buffer to a transferee or loading data in an I/O controller buffer and then sending the data to an initiating agent. However, Grun does not disclose buffering a plurality of data associated with a plurality of write transactions, and then flushing the collected data to an I/O device.

In reference to Applicant's claim 31, applicant discloses determining **whether a latency condition exists**, the latency condition including a delay in receiving a next combinable write transaction from the processor and an interface to the I/O device being in an idle states. Examiner points to Grun's Fig. 6 and col. 12, lines 51-61; however, Grun does not disclose or suggest determining a latency condition or further flushing data if a latency condition exists.

Therefore, Applicants respectfully submit that claims 1, 12, 21, 31, and 34 are in condition for allowance, and furthermore, that dependent claims 2-11, 13-20, 22-30, 32-33, and 35-36 are also

in condition for allowance for at least the same reasons stated above.

If there are any additional charges, please charge Deposit Account No. 50-0221. If a another telephone interview would in any way expedite the prosecution of the present application , the Examiner is invited to contact David P. McAbee at (503) 712-4988.

Respectfully submitted,  
Intel Corporation

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/s/David P. McAbee/Reg. No. 58,104/  
David P. McAbee  
Reg. No. 58,104

Intel Corporation  
M/S JF3-147  
2111 NE 25<sup>th</sup> Avenue  
Hillsboro, OR 97124  
Tele – 503-712-4988  
Fax – 503-264-1729